



School-Based ACCESS Program Spring 2023 Newsletter

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Spring is almost here – and the final quarter of the 2022-2023 School Year. The Pennsylvania Department of Human Services (DHS), Pennsylvania Department of Education (PDE), Public Consulting Group (PCG) and Sivic Solutions Group (SSG) would like to share with and remind you of the following information regarding the Pennsylvania School-Based ACCESS Program (SBAP).

1. Annual Cost Reconciliation – CPE Form Deadline 05-22-2023

The Desk Review process for cost reporting of 21-22 was completed February 28, 2023. Thank you for ensuring that your data was accurate.

In the weeks that follow, the final cost settlement for 21-22 will be calculated. In early May, LEAs will receive notice that their final cost settlement is ready for review and approval. Upon notification that your LEA's Cost Settlement is ready for review, LEAs will have until **May 22, 2023** to complete their CPE form and upload it into the cost settlement system. Please remember that when completing your CPE form, you need to fill out both the account code and signature sections prior to uploading.

SSG is conducting oversight and monitoring for the FY20-21 cost report for selected LEAs. If your LEA was chosen, please make sure all supporting documentation is uploaded by **March 23, 2023**. SSG will reach out if additional information and/or clarification is needed. Please respond to those requests in a timely manner.

2. Random Moment Time Study (RMTS)

Calendars and Staff Pool Lists for the April – June 2023 quarter were due February 24, 2023.

RMTS is designed to determine the amount of time participants are involved in a Medicaid billable activity, which has a significant impact on SBAP reimbursement.

It is important to ensure your LEA's participants are:

- responding timely to their assigned moments;
- providing a clear picture of what activity is occurring during their assigned moments -- the quality of the moment response is just as important as responding to the moment; and
- answering all RMTS follow-up questions, if received. This means additional information is needed to clarify their original response.

For LEA Admin:

1. General Reminders

- Maintain supporting documentation of the activity identified during moment response.
- Ensure direct service providers hold the appropriate and valid certification or licensure for the services they provide.
- Do NOT include a provider on the direct service staff pool list if that provider is unlikely to provide or is not providing direct services to a SBAP student.
- Be sure to select any holidays and breaks that apply to your LEA. **Holidays have not been pre-selected.**

2. Shifts

Shifts should be created and assigned to participants so that the shift covers the time they are working and being paid.

- Shifts must cover the earliest start time and latest end time of the participant.
- LEAs with only 1 full-time shift are strongly encouraged to carefully review their shift to ensure it covers the full workday for **all their staff**. For example: 8:30am – 3:15pm.
- Shifts should be utilized for service providers (e.g., Contractors) who work at specific days/times; for example, Monday and Wednesday from 9:00am – 11:30am.

Tool: [Shift Tips and Reminders](#)

3. Vacancy Positions

All positions reported on the staff pool are eligible to be assigned a moment. **Vacancies should only be used if you expect to fill the position with a participant that quarter.** A moment received by a vacant position will negatively impact reimbursement.

- If you are contacting PCG to close a moment for a participant who is no longer working, be sure to delete or replace the position when certifying the next quarter's staff pool list.
- Delete or replace positions if a participant vacates their position during the quarter before certifying the next quarter's staff pools.
- LEAs where the number of vacancies exceeds 20% of the entire staff pool list when certifying will be asked for confirmation.
- LEAs where the number of vacancies significantly increased compared to the previous quarter will be asked for confirmation.

Each participating LEA is required to participate in the RMTS with a goal of a 100% response rate for each of the two cost pools, Direct Service and Administrative Support. DHS may issue warning letters to LEAs who are not meeting individual compliance of 85%. LEAs in default over multiple quarters may not be able to continue participation in the SBAP.

Tool: [RMTS Response Compliance Tips and Reminders](#)

New to SBAP or need a refresher? Training Webinars are offered every Tuesday at 11am. You can sign up [HERE](#)

3. Medicaid Administrative Claiming (MAC)

CPEs:

- Certified Public Expenditure (CPE) Forms for the **July – September 2022 quarter** were due **February 23, 2023**.
- Certified Public Expenditure (CPE) Forms for the **October – December 2022 quarter** will be available in late Spring. Please look for their delivery.

Starting with the July-September 2022 Quarter, CPE forms are being electronically signed. [Electronic CPE Signature Instructions](#) can be referenced under the 'Resources' Section of PCG's Claiming System.

Cost Reporting Reminders:

- LEAs must receive direct service claiming reimbursement to receive and retain MAC reimbursement within the same fiscal year.
- **ALWAYS REPORT 100% of what was paid to employees** listed in the claiming system for the quarter you are reporting for.
- **Report any Federal dollars used to offset the cost of the employees in the Federal Offset section.** The amounts that are included in the Federal Offset section will be deducted from the total costs as these Federal dollars are not an allowable cost to the LEA.
- Quarterly costs for MAC are reported on a **cash basis**.
- Failure to submit a signed copy of the CPE before the **10-business-day deadline** will result in the claim **not** being included in that quarter's payment submission. If a signed copy is received by PCG after the deadline, payment will be delayed until the next quarter's payment submission within the fiscal year deadline.

Please note: The Department may issue warning notifications throughout the year when it determines an LEA has received no direct service claiming reimbursement as of the date of the notice and is in danger of losing its SBAP reimbursement. This notification affords the LEA an opportunity to identify and address any direct service claiming issues prior to the end of the year.

MAC Reimbursement:

- **January - March 2023** quarter cost reporting certification will open **April 3rd, 2023**.

Receipt of MAC Reimbursement:

- *Quarterly MAC payments are directly deposited into the bank account identified by your LEA. If no bank account is identified, a paper check will be sent.*
- **Reminder** to LEAs to keep bank account information updated. Failure to do so will also result in receiving a paper check.
- **If you have not added/updated your bank information or have any questions, please contact:** Payable Services Call Center at 877-435-7363 (option 1).
 - ✓ [Add a New Bank Account](#)

- ✓ [Change Existing Bank Account Details](#)
- **Please note:** if an LEA has a CRP block with the Commonwealth, MAC reimbursement will not be received until the block is resolved.

4. Direct Service Reimbursement and Telemedicine

Assistive Devices

Under the School-Based ACCESS Program (SBAP), participating LEAs are eligible to claim Medical Assistance (MA) reimbursement for procurement and repairs of student-specific assistive technology devices, provided the following criteria are met and/or forms are completed.

If the LEA is submitting an eligible assistive device for SBAP reimbursement, the ownership of the device must be transferred to the student. The LEA must send a *Transfer of Ownership* letter to notify the parent of a possible transfer.

If an LEA makes the decision that they want to use SBAP reimbursement for an Assistive Device, but not transfer ownership to the student, they can draw down reimbursement from their FAI account by submitting a [PDE-352 form](#).

Additional information regarding claiming for Assistive Devices can be found here: [Pennsylvania School-Based Access Program Document Library \(pcgus.com\)](#) and Section 3.1 of the [School-Based ACCESS Program \(SBAP\) Handbook](#).

Logging Date of Service for Timely Filing

Due to MA timely filing limits of 180 calendar days from the date of service, LEAs could miss reimbursement opportunities if services are not entered timely. *Best practice for LEAs is to enter all direct and specialized transportation services into EasyTrac no more than 60 days from the date of service to allow time for processing. It is recommended to enter service logs into EasyTrac by the 15th of each month.*

5. Revalidation Reminder

Section 6401 of the Affordable Care Act (ACA) established the requirement for Medicare and Medicaid to revalidate enrollment information at least every five (5) years for all enrolled providers, regardless of provider type, under new enrollment screening criteria.

Section 2 of the [SBAP Handbook](#) outlines the enrollment process, including revalidation. Please remember that only paper applications may be used for Provider Type 35. A sample application is available [here](#).

Ordering, Referring, Prescribing Providers

This also includes enrollment of Ordering, Referring and Prescribing Providers (**Section 2.3**) The federal Patient Protection and Affordable Care Act (ACA) and implementing regulations require that all states comply with the provider screening and enrollment regulations found in the Code of Federal Regulations, including [42 CFR 455.410](#). This provision requires physicians and other practitioners who order or refer items or services for beneficiaries to enroll as MA providers. This federal requirement means that all physicians and other prescribing practitioners, who order/prescribe SBAP services, must

be enrolled as MA providers. Refer to [MA Bulletin 99-16-07](#) titled “Enrollment of Ordering, Referring and Prescribing Providers.”

LEAs are required to enter their prescribing practitioner’s credentials in EasyTrac in order for the service to be eligible for reimbursement. **A list of authorizing/prescribing practitioners and the services they may authorize/prescribe can be found in Section 4.2 of the [SBAP Handbook](#).**

- **National Provider Identifier (NPI)**
 - 10-digit number, assigned to the provider on the federal level
 - This should be the prescribing practitioner’s individual NPI, not the number for the practice they own or are associated with
- **MA Provider Number**
 - 13-digit number, assigned to the provider on the state level by DHS
 - This is the prescribing practitioner’s MA Provider Number, **not** the LEA’s number

Reminder to each provider that:

1. LEAs MUST use the pre-printed application found at the link on the DHS SBAP website to ensure that appropriate and accurate information is provided. Do NOT make any changes to the pay-to address information on that pre-printed application.
2. LEAs MUST submit their paper application to either the mailing address or the email address. However, email submission may reduce processing time.
3. If the LEA is late in submitting an application for revalidation, their location will auto-close, which could result in missed claiming opportunities until the LEA is able to reestablish an active location.

Note: If your LEA has changes to information such as physical address or tax ID number, those changes should be reported to enrollment staff when the change occurs to avoid issues with revalidation.

Please note that due to high application volume, there is a backlog in processing revalidation applications. LEAs should allow at least 90 days for processing but may encounter longer processing times. LEAs are encouraged to monitor their revalidation process.

A copy of the Pennsylvania MA Bulletin regarding revalidation can be found here:

https://www.dhs.pa.gov/docs/Publications/Documents/FORMS%20AND%20PUBS%20MAP/c_228794.pdf

6. Commitment to Compliance

Logging Direct Services

Per Section 4.4 of the [SBAP Handbook](#), Provider logs are daily progress notes and should only be completed by qualified providers. The daily logs provide evidence of a delivered service, progress toward the goals and objectives, analysis of treatment strategy and needed adjustments, and the continued need for services supporting medical necessity.

Provider logs are a tool used to gauge the student’s progress. Cutting and pasting of entries (cloned charting) to the provider logs is not an acceptable practice for billing services in SBAP. Each entry should

reflect the student’s status during the particular time period the provider is documenting. Charting in large increments of time is not recommended.

Reminder:

Provider logs are required to contain exact “Start Time” and “End Time”. Rounding up service minutes is prohibited. Most SBAP services are based upon a 15-minute billing unit; exceptions to the 15-minute billing unit include evaluations and medication administration. Non-consecutive service minutes may accumulate on a date of service for the same service type provided to the same student.

If LEAs choose to develop their own provider log template, the logs *must* reflect the required information contained in the DHS templates.

Provider Credentialing

DHS has recently received multiple questions about the credentialing requirements of certain providers. In response to these questions, DHS has created a [Credentialing Frequently Asked Questions](#) document which is now available on the [SBAP Website](#). Additional credentialing information can be found within Section 3 of the [SBAP Handbook](#).

7. Important Information About the End of Continuous Eligibility

The Shapiro Administration and the Department of Human Services (DHS) are urging anyone enrolled in Medical Assistance (MA) to make sure their contact information is correct so they can receive timely updates about their benefits. Under new federal law, continuous MA eligibility will be separated from the public health emergency and **will end on April 1, 2023**. More details can be found [here](#).

Continuous eligibility means that many MA beneficiaries are out of synch with renewal and redetermination requirements and timelines. LEAs can share information to help ensure parents/guardians are aware of the upcoming review and understand the importance of providing up-to-date information to the County Assistance Office to allow for an appropriate determination of eligibility.

8. New to SBAP? Check out SBAP 101

In addition to the information below, LEAs are encouraged to review the LEA Participation Flowchart (Appendix D) in the [SBAP Handbook](#).

These resources will provide you with the necessary documents to get up and running:

- If you are new to the School-Based ACCESS Program or know someone who is, please refer them to the ["SBAP 101"](#) section of PCG’s SBAP website.
- *New to SBAP or need a refresher? Various Training Webinars are available throughout the week. You can sign up [HERE](#)*

9. LEA Contact Information – Update Your Forms!

With the recent cost reporting requirements, it was discovered that many communications were not successfully delivered to some LEAs. It is important to check your inbox settings to ensure that all SBAP communication from DHS and its vendors is being received. These communications include important information such as LEA responsibilities and deadlines.

To ensure receipt of SBAP updates and communications, please remember to update your LEA's contact information using the [School-Based ACCESS Program Contact Information Form](#) and return it to RA-PWSBAP@pa.gov as information changes or new people join your team!

Questions? Contact the SBAP Vendors!

PCG Help Desk: 1-866-912-2976 or SBAPSupport@pcgus.com

*Support for RMTS, MAC and Direct Services/Special Transportation Claiming

SSG Help Desk: 1-877-916-3222 or PAsupport@sivicsolutionsgroup.com

*Support for Cost Settlement/Cost Reconciliation and Interim Rate Adjustments